



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION

2013 DEC 12 AM 11:48

CELA

**MEMORANDUM**

TO: The Commission

FROM: Lisa J. Stevenson  
Deputy General Counsel for Law

Daniel A. Petalas *DAF*  
Associate General Counsel

Kathleen Guith *Ka*  
Deputy Associate General Counsel

Mark Shonkwiler *MS*  
Assistant General Counsel

Margaret R. Howell *MCH*  
Attorney

SUBJECT: MUR 6413 (Taxpayer Network)

RE: Office of the General Counsel's Notice to the Commission Following the  
Submission of Probable Cause Brief

On July 1, 2013, the Office of the General Counsel ("OGC") mailed Taxpayer Network a brief ("General Counsel's Brief") setting forth the factual and legal basis upon which OGC was prepared to recommend that the Commission find probable cause to believe that Respondent violated 2 U.S.C. §§ 434(f) and 441d.<sup>1</sup> A copy of that brief was provided to the Commission on July 2, 2013. Respondent did not submit a reply brief within the statutory fifteen day period. See 2 U.S.C. § 437g(a)(3). Respondent has since indicated that it did not intend to submit a reply brief and wishes to settle the matter. Letter from Paul Sullivan, Counsel, Taxpayer Network, to Margaret Howell, Att'y, FEC (Aug. 19, 2013).

<sup>1</sup> The return receipt indicates that Respondent received the General Counsel's Brief on July 15, 2013.

Pursuant to the Agency Procedure Following the Submission of Probable Cause Briefs by the Office of General Counsel, 76 Fed. Reg. 63,570 (Oct. 13, 2011), OGC is hereby notifying the Commission that it intends to proceed with the recommendation to find probable cause to believe that Respondent violated 2 U.S.C. §§ 434(f) and 441d based on the factual and legal analysis set forth in the General Counsel's Brief. A copy of this Notice is being provided to the Respondent contemporaneously.

**RECOMMENDATION**

Find probable cause to believe that Taxpayer Network violated 2 U.S.C. §§ 434(f) and 441d.

14044353924